

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,
THE JOHNS HOPKINS UNIVERSITY,
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,
NORTHWESTERN UNIVERSITY, UNIVERSITY OF
NOTRE DAME DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125-MFK

Judge Matthew F. Kennelly

**DECLARATION OF STEVEN WEISBROT, ESQ. OF ANGEION GROUP LLC
RE: PROPOSED NOTICE PLAN FOR THE FOURTH TRANCHE SETTLEMENTS**

I, Steven Weisbrot, Esq., hereby declare under penalty of perjury as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing, developing, analyzing, and implementing large-scale legal notification plans.
2. I have personal knowledge of the matters stated herein. In forming my opinions regarding notice in this action, I have communicated with class counsel and reviewed relevant pleadings and

other documents relating to the case, in addition to drawing from my extensive class action notice experience.

3. Background information on my professional experience and Angeion's expertise with the design and implementation of hundreds of court-approved notice and administration programs, including some of the largest and most complex notice plans in recent history, is set forth in my prior declaration submitted with the preliminary approval motion of the University of Chicago Settlement. *See* Aug. 14, 2023 Declaration of Steven Weisbrot, Esq. of Angeion Group LLC re the Proposed Notice Plan, ¶¶ 3-10 & Exhibit A (ECF No. 428-7).

4. On September 9, 2023, the Court preliminarily approved the Plaintiffs' proposed class settlement with defendant University of Chicago. *See* ECF No. 439 ("University of Chicago Preliminary Approval Order"). As part of that preliminary approval, the Court appointed Angeion as the Settlement Claims Administrator, and it approved the proposed notice plan. *See id.* ¶¶ 8, 14-15.

5. On January 23, 2024, Plaintiffs filed a Motion for Preliminary Approval of Settlements with Brown University ("Brown"), The Trustees of Columbia University in the City of New York ("Columbia"), Duke University ("Duke"), Emory University ("Emory"), and Yale University ("Yale") (these settling defendants collectively, the "Second Tranche Settling Universities" or "Second Tranche Settling Defendants;" and these settlements, the "Second Tranche Settlements"). In the accompanying declaration submitted with that motion, I described the Revised Notice Plan, which combined the University of Chicago Settlement and Second Tranche Settlements into one notice plan in order to maximize efficiency and avoid confusion for the Settlement Class. *See* Jan. 22, 2024 Weisbrot Decl., ECF No. 603-10. The Court preliminarily approved the Second Tranche Settlements on February 14, 2024. *See* ECF No. 614.

6. Plaintiffs subsequently reached settlements with Trustees of Dartmouth College ("Dartmouth"), Northwestern University ("Northwestern"), William Marsh Rice University ("Rice"), and Vanderbilt University ("Vanderbilt") (these settling defendants collectively, the

“Third Tranche Settling Universities” or “Third Tranche Settling Defendants;” and these settlements, the “Third Tranche Settlements”).

7. The Notice Plan for the Third Tranche Settlements mirrored the Notice Plan previously approved for the First and Second Tranche Settlements and amended the previously approved notices to: (a) include information relating to the Third Tranche Settlements and (b) show that the end date for the Class Period for the Settlement Class definition is the date of preliminary approval of the Third Tranche Settlements. *See* February 23, 2024 Weisbrot Decl., ECF No. 629-8. The Court preliminarily approved the Third Tranche Settlements on February 28, 2024. *See* ECF No. 638.

8. Plaintiffs have now reached settlements with Trustees of California Institute of Technology (“Caltech”) and The Johns Hopkins University (“Johns Hopkins”) (these settling defendants collectively, the “Fourth Tranche Settling Universities” or “Fourth Tranche Settling Defendants;” and these settlements, the “Fourth Tranche Settlements”).

9. Accordingly, the proposed Notice Plan for the Fourth Tranche Settlements mirrors the Notice Plans approved by this Court for the previous Settlements and updates the previously approved notices to (a) include information relating to the Fourth Tranche Settlements; and (b) provide information about how to opt out of the Fourth Tranche Settlements (regardless of whether the individual opted out of previous settlements).

10. Like the previous Notice Plans, the Fourth Tranche Notice Plan will include direct notice and a targeted media campaign. Using the data provided by Defendants and data acquired from claims submissions from the prior tranches of settlements, Angeion will email a “Summary Notice” (attached hereto as Exhibit B) to all those Settlement Class Members for whom Angeion has a valid email address. To the extent that Angeion receives “bounce backs” from email addresses or lacks an email address for the Settlement Class Member, and postal addresses are available for those individuals, Angeion will send the “Long-Form Notice” (attached hereto as Exhibit A) via first class mail. Settlement Class Members will also be able to download a copy of the Long-Form Notice from the Settlement Website, www.FinancialAidAntitrustSettlement.com, or by requesting

it via email, mail, or the toll-free hotline. Angeion will also employ a robust media campaign designed to provide notice to Settlement Class Members via internet notice, social media notice, a paid search campaign, and two press releases.

11. The estimated costs for the Fourth Tranche Notice Plan are approximately \$350,000.

12. The prior Notice Plan was highly effective at reaching the Settlement Class. The Notice Plan resulted in 68,468 presumptively valid and timely claims as well as 7,875 claims that were either submitted online or received and/or postmarked after the December 17, 2024 deadline, but no later than December 31, 2024. Given that the estimated total number of Settlement Class Members is 200,000, this means the prior Notice Plan resulted in a claims rate of between approximately 34% and 38% (depending on whether the late submissions between December 18, 2024 and December 31, 2024 are considered). Angeion has begun processing these claims and anticipates that distributions will begin, upon Court approval according to the Allocation Plan, in approximately mid-May 2025.

13. It remains my professional opinion that the Notice Plan will provide full and proper notice to Settlement Class Members before the claims, opt-out, and objection deadlines. Moreover, it is my opinion that the Notice Plan is the best notice that is practicable under the circumstances and fully comports with due process, and Fed. R. Civ. P. 23. After the Revised Notice Plan has been executed, Angeion will provide a final report verifying its effective implementation to this Court.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 17, 2025


STEVEN WEISBROT